

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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WILLIS TOWERS WATSON PUBLIC LIMITED  
COMPANY and WILLIS RE INC.,

21-CV-00487 (JMF)

Plaintiffs,

v.

PAUL HERRIOTT,

Defendant.  
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**DECLARATION OF NEIL MORRELL**

Neil Morrell, declares under penalty of perjury as follows:

1. I am the Chief Executive Officer of MagMutual. I have personal knowledge of the facts stated in this declaration.

2. Paul Herriott and I have been friends for many years. We were colleagues at Willis Re, Inc. (“Willis Re”), where I worked until April 2012, when I left to join MagMutual. We have remained personal friends since my departure.

3. I served as Willis Re’s Healthcare Segment Leader prior to my departure from the firm. Scott Strenge replaced me in that role. To the best of my knowledge, Paul has never been the Healthcare Segment Leader at Willis Re, and I have never heard him being referred to as holding that position.

4. From before I joined MagMutual until recently, Willis Re was the reinsurance broker for MagMutual. I had primary responsibility on behalf of MagMutual for working with Willis Re on reinsurance matters from the time I joined MagMutual. During my tenure at MagMutual (which continues), the Willis Re brokers who worked on the MagMutual account were Joel Wendland and Tim Metke. In my view, Joel specifically had overall responsibility for the

MagMutual account.

5. To my knowledge, Paul never worked on or dealt with MagMutual matters at all at Willis Re and certainly did not have any position of responsibility in connection with the account.

6. In September 2020, at my request, Paul organized a Zoom cocktail hour with Joel, Tim, Sean Whelan (another Willis Re broker), and me. Like Paul, Sean never worked on the MagMutual account. However, like Paul, Sean is a personal friend and former Willis Re colleague. This Zoom get together was a Covid-era social event among friends and former colleagues; it did not have a business purpose.

7. In November 2020, I proposed a social dinner in Miami with Joel, Tim, Paul and Sean. I asked that Paul and Sean join simply to have the pleasure of their company and not for any business-related purpose. Unfortunately, our plans for the dinner were cancelled and it never took place.

. I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Dated: Atlanta, Georgia  
March 15, 2021

  

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Neil Morrell